

Frederick County, Maryland described as Lots 8, 9, and 10 of the Rhodes Addition to Knoxville, by reason of a deed from Archie T. Shafer and Emma R. Shafer, his wife, said deed dated August 30, 1972 and recorded among the Land Records of Frederick County, Maryland in Liber 888, folio 158, and copy of said deed is attached hereto and labeled Exhibit I and prayed to be incorporated in this Bill of Complaint.

SECOND: That Julia M. Shafer, a predecessor in title to Lot 8 Rhodes Addition to Knoxville a part of the property above described by deed dated February 28, 1944 and recorded in Liber 441, folio 372, did present a claim of actual, visible, continuance, adverse, hostile, and uninterrupted possession of the said parcel, by her predecessors in interest Thomas K. Shafer and Lizzie M. Shafer from approximately 1905-1906 and by herself from 1906-1944 a copy of said deed is hereto attached and labeled Exhibit II and is prayed to be incorporated in this Bill of Complaint, and further that a record chain of title exists from said Julia M. Shafer to Archie T. Shafer and Emma R. Shafer, his wife, grantors of your Complainants.

THIRD: That on the 27th day of August, 1881, Philip Porter and Mary J. Porter, his wife, did convey by deed recorded in Liber A.F. 3, folio 708, of the Land Records of Frederick County, Maryland, all their right, title and interest in Lot 8 the Rhodes Addition to Knoxville unto James P. Biser, copy of said deed attached hereto and marked Exhibit III and prayed to be incorporated herein.

FOURTH: That record title to Lot 8 of the Rhodes Addition to Knoxville is in the hands of Frederick Merten, Charles A. Rice, and Thomas B. Biser, Trustees for the benefit of Creditors of James P. Biser. All real estate and property, by deed of trust being recorded July 27, 1897 in Liber JLJ16, folio 371, of the Land Records of Frederick County, copy attached hereto and labeled Exhibit IV and prayed to be incorporated in this Bill of Complaint, and further that on August 6, 1897 said trustees did file in the Circuit Court for Frederick County, sitting as a Court of Equity, a Petition for the Court to Assume Jurisdiction of the Trust. Said case being docketed in Liber DHH2, folio 368, copy attached hereto and labeled Exhibit V and